

EXHIBIT A

FROM :

PHONE NO. : 215 643 0489

Jun. 07 2001 09:48AM P2

06/07/2001 07:53 6104950286

MARKBLOND

PAGE 02

This Deed, made this 22nd day of April

one thousand nine hundred and fifty-five (1955)

between LEONIA E. SIMMERS, widow and EDWIN H. SIMMERS, both of the Township of Upper Upland, County of Montgomery, Commonwealth of Pennsylvania,

(hereinafter called the Creators),

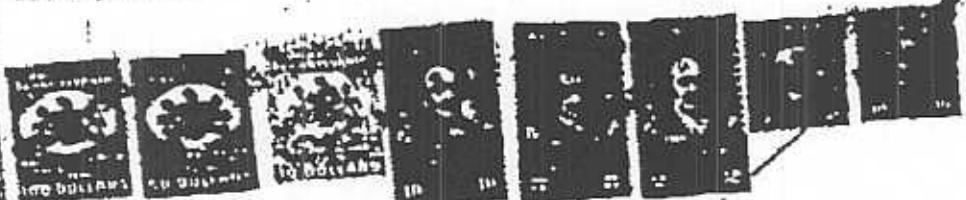
and THE ATLANTIC RAILING COMPANY, incorporated in Pennsylvania,

(hereinafter called the Grantee).

Witnesseth, That in consideration of \$16,000.00 (16,000.00) Dollars in hand paid, the receipt whereof is hereby acknowledged, the said Creators do hereby grant and convey unto the said Grantee, its successors and assigns, all that certain piece or parcel of land situated in the Township of Upper Upland, County of Montgomery, Commonwealth of Pennsylvania, more particularly described in accordance with a Survey and Plan thereof made by Robert W. Inverarity, Registered Surveyor, dated December 20, 1954, as follows: to wit:

described at a steel pipe set at the intersection of the southeasterly side of Welsh Road (45 feet wide) with the southeasterly side of Lincklin Pike (30 feet wide); extending thence (1) along the said southeasterly side of Welsh Road South 42 degrees 03 minutes 30 seconds East 300 feet to a steel pipe; thence (2) at right angles to Welsh Road and along line of other land of Leonia E. Simmers and Edwin H. Simmers South 17 degrees 36 minutes 40 seconds West 93.38 feet to a steel pipe; thence (3) still along line of other lands of Leonia E. Simmers and Edwin H. Simmers North 32 degrees West 93.38 feet to a steel pipe set in the said southeasterly side of Lincklin Pike; and thence (4) along said southeasterly side of Lincklin Pike North 8 degrees East 300 feet to the steel pipe at the first mentioned point and west of beginning.

being part of the same premises which Leonia E. Simmers, widow, by Deed dated January 10, 1944, and recorded in the Office for the Recording of Deeds in and for Montgomery County in Book 1566, page 444, created and conveyed to Leonia E. Simmers, widow, and Edwin H. Simmers, in fee.



VALUATION IS \$16,000 AND TAX
ORDINA FOR THIS VALUATION
PAID ON SUCH VALUATION
COMMONWEALTH TITLE CO
D. M. Head

D-2500-21

FROM :

PHONE NO. : 215 643 9489

Jun. 07 2001 09:48AM P3

06/07/2021 07:53

5184958266

MARKETING

THE
COMMONWEALTH LAND
TITLE INSURANCE COMPANY

PAGE 23

SPECIAL WARRANTY DEED

THIS INDENTURE is made this 30th day of June
19 83 , between ATLANTIC AIRFIELD COMPANY, a Pennsylvania
corporation, authorized to transact business in
and having an office at 518 South Flower Street, Los Angeles,
California 90071 ("GRANTOR") and MARLENE KESTEN,
P.D. #2, P.O. Box 087, Newtown, Pennsylvania

GRANTOR, in consideration of \$ 115,000 in
hand paid does convey unto the GRANTEE, the following described
real estate, together with the benefits appurtenant thereto, in
the Maple Glen, Upper Dublin Township County of Montgomery,
State of Pennsylvania to-wit:

BEGINNING at a steel pipe set at the intersection of the southwesterly side of Welsh Road (45 feet wide) with the southeasterly side of Limekiln Pike (20 feet wide); extending thence (1) along the said southwesterly side of Welsh Road South 42 degrees 03 minutes 20 seconds East 200 feet to a steel pipe; thence (2) at right angles to Welsh Road and along line of other land of Levinia K. Simmers and Edwin H. Simmers South 47 degrees 56 minutes 40 seconds West 93.38 feet to a steel pipe; thence (3) still along line of other lands of Levinia K. Simmers and Edwin H. Simmers North 83 degrees West 93.38 feet to a steel pipe set; in the said southeasterly side of Limekiln Pike; and thence (4) along said southeasterly side of Limekiln Pike North 8 degrees East 200 feet to the steel pipe at the first mentioned point and place of BEGINNING.

Prior Deed reference: Deed dated April 23, 1955 and recorded in Montgomery County on April 25, 1955 in Deed Book Volume 2844, Page 211.

P-54-00-10180-00-9

MONTGOMERY COUNTY COMMISSIONERS REGISTRY
14-05-16188-00-5 F BURLM HX 2364
169 LIMERICK FIVE # 0215
ATLANTIC REFINING CO 27.
B 48 S 31 E 114W DATE 12/20/01

~~1150.00~~

MAIL OF PERSONS IN COUNTRY IS 99
ORDINARY MAIL APPROVED FOR THE
P.T.T. - 1945

A rectangular stamp from the Commonwealth of Pennsylvania, Department of Revenue. The text "COMMONWEALTH OF PENNSYLVANIA" is at the top, followed by "DEPARTMENT OF REVENUE". In the center is a circular logo featuring a figure holding a sword and shield, with the words "THE GREAT SEAL OF THE STATE OF PENNSYLVANIA" around it. Below the logo is the number "575.00". To the left of the stamp is a tax slip with handwritten text: "PAULIT", "TRANSPORTED", "REVENUE", "TAX", "PA.", and "575.00".

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF REVENUE

FRAUD TRANSFER TAX		575.00
		RECEIVED

Non Profit membership includes NYTMA
membership for all 2017 continuing
writing lines and NYTMA website.

8748

4728-1760

EXHIBIT B

1 UNITED STATES DISTRICT COURT
2 EASTERN DISTRICT OF PENNSYLVANIA

3 EXECUTIVE CAR WASH OF : NO. 02-CV-3747
4 MAPLE GLEN, :
5 Plaintiff :
6 : :
7 vs. : :
8 : :
9 ENVIRONMENTAL, INC. and :
10 ENVIRONMENTAL HAZARD :
11 SERVICES, INC., :
12 Defendants :
13 - - -

COPY

9 February 19, 2004
10 Philadelphia, Pennsylvania

11 - - -
12 Oral Deposition of JOHN SECKER,
13 held in the offices of Marks, O'Neill,
14 O'Brien & Courtney, 1880 John F. Kennedy
15 Boulevard, 12th Floor at 12:00 p.m. on
16 the above date before Michelle M. Zuino,
17 a Professional Court Reporter and
18 Commissioner of Deeds in the Commonwealth
19 of Pennsylvania.

20 - - -
21 ESQUIRE DEPOSITION SERVICES
22 1880 John F. Kennedy Blvd.- 15th Floor
23 Philadelphia, Pennsylvania 19103

1 the DEP will notify them.

11

2 Q. Do they have documentation
3 at the station that they show you that
4 their tank has been registered?

5 A. Yes.

6 Q. How long have you been doing
7 these inspections?

8 A. '97.

9 Q. Prior to you having your own
10 business where were you employed?

11 A. With Atlantic Petroleum
12 Technologies.

13 Q. Where were they located?

14 A. In Broomall -- no. Yes.

15 Broomall. It was two different
16 locations. But I think Broomall was the
17 first one.

18 Q. Were they ever at Dutton
19 Mill Industrial Park?

20 A. In Aston, also.

21 Q. How long did you work for
22 Atlantic Petroleum Technologies?

23 A. Until '94.

24 Q. From when?

1 A. I believe '91.

2 Q. So in December of '92 were
3 you employed at Atlantic Petroleum
4 Technologies, Inc.?

5 A. Yes.

6 Q. I'm going to show you a
7 document which was previously marked as
8 Carney Number 4.

9 Do you know John Carney,
10 Jack Carney?

11 A. Doesn't ring a bell.

12 Q. Take a look at that letter.

13 A. (Witness complies.)

14 Okay.

15 Q. After reading that letter
16 can you confirm is that your signature at
17 the bottom of the page?

18 A. It appears to be, yes.

19 Q. Do you know who Richard
20 Berkes is?

21 A. Doesn't ring a bell.

22 Q. Do you see the letter is
23 written to Environmental Hazards
24 Services, Inc.?

1

Q. Did he own ATP or --

20

2

A. I don't know.

3

Q. -- did he work at ATP?

4

A. Yes.

5

Q. Frank, Senior, is he also at

6 APTL?

7

A. No. He's retired as far as
I know.

8

Q. He is deceased?

9

A. No.

10

Q. Is he deceased?

11

A. No.

12

Q. Atlantic Petroleum
Technologies, Inc., the business, do you
know who the shareholders were?

13

A. No.

14

Q. Do you know who the
president was?

15

A. I think it was Lawrence.
But I'm not sure.

16

Q. Did you ever enter into any
business relationship with Lawrence?

17

A. I worked for him.

18

Q. You worked for him at

1 Atlantic Petroleum Technologies?

21

2 A. Right.

3 Q. After ATP did you ever work
4 for him?

5 A. Yes.

6 Q. Where was that?

7 A. With Atlantic Petroleum
8 Technologies Louisiana.

9 Q. Was that a successor to APT,
10 Inc.?

11 A. It was formed after Atlantic
12 Petroleum Technologies went bankrupt, as
13 far as I know.

14 Q. When did they go bankrupt?

15 A. I believe it was '94.

16 Q. Is Atlantic Petroleum
17 Technologies Louisiana still in business?

18 A. No.

19 Q. Did they go bankrupt?

20 A. I don't know.

21 Q. Are you still friends with
22 the McLaughlin's?

23 A. Yes.

24 Q. You said you talked to